

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                                   |  |
|-----------------------------------|--|
| <b>UNITED STATES OF AMERICA :</b> | <b>CRIMINAL NO.</b> _____                            |
| <b>v.</b>                         | <b>:     DATE FILED</b> _____                        |
| <b>JACK KARLIN, D.O.</b>          | <b>:     VIOLATION:</b>                              |
|                                   | <b>:     :</b>                                       |
|                                   | <b>:     21 U.S.C. § 841(a)(1)</b>                   |
|                                   | <b>:     (Dispensing and distributing controlled</b> |
|                                   | <b>:     substances - 323 counts)</b>                |
|                                   | <b>:     18 U.S.C. § 1347</b>                        |
|                                   | <b>:     (Health care fraud -2 counts)</b>           |
|                                   | <b>:     18 U.S.C. § 1512(b)(1)</b>                  |
|                                   | <b>:     (Witness tampering -1 count)</b>            |

**INDICTMENT**

**COUNTS ONE THROUGH SEVENTY-SIX**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Defendant **JACK KARLIN, D.O.**, was a doctor of osteopathic medicine,  
  
licensed  
  
to practice medicine by the Commonwealth of Pennsylvania.
2. Federal law regulates the dispensing of substances which are listed as “controlled substances," which may be dispensed to an ultimate user through the lawful order of an authorized medical practitioner, that is, a prescription.
3. A prescription for a controlled substance must be issued for a legitimate purpose by a medical practitioner acting in the usual course of his professional practice. An order purporting to be a prescription, issued neither in the usual course of professional treatment nor for legitimate and authorized research, is not a "prescription" under federal law.

4. On or about each of the dates listed below, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

**JACK KARLIN**

did knowingly and intentionally dispense and distribute the controlled substances listed below, that is Percocet, which contains oxycodone, a Schedule II controlled substance; Seconal, which contains secobarbital, a Schedule II controlled substance; Tuinal, which contains secobarbital and amytal, Schedule II controlled substances; Nembutal, which contains pentobarbital, a Schedule II controlled substance; and Valium, which contains diazepam, a Schedule IV controlled substance, to Arthur Rodia, Sr., without a legitimate medical purpose and outside the usual course of professional practice:

| <b>COUNT</b> | <b>DATE</b>       | <b>SUBSTANCES</b> | <b>QUANTITY (pills)</b> |
|--------------|-------------------|-------------------|-------------------------|
| 1.           | January 20, 2000  | Percocet          | 60                      |
| 2.           | January 20, 2000  | Seconal           | 60                      |
| 3.           | January 20, 2000  | Valium            | 30                      |
| 4.           | February 18, 2000 | Percocet          | 60                      |
| 5.           | February 18, 2000 | Nembutal          | 60                      |
| 6.           | February 18, 2000 | Valium            | 30                      |
| 7.           | March 17, 2000    | Percocet          | 60                      |
| 8.           | March 17, 2000    | Nembutal          | 60                      |
| 9.           | March 17, 2000    | Valium            | 90                      |
| 10.          | May 5, 2000       | Percocet          | 60                      |
| 11.          | May 5, 2000       | Nembutal          | 60                      |
| 12.          | May 5, 2000       | Valium            | 90                      |

|     |                    |          |     |
|-----|--------------------|----------|-----|
| 13. | June 2, 2000       | Percocet | 60  |
| 14. | June 2, 2000       | Valium   | 90  |
|     |                    |          |     |
| 15. | July 28, 2000      | Percocet | 100 |
| 16. | July 28, 2000      | Tuinal   | 60  |
| 17. | July 28, 2000      | Valium   | 90  |
| 18. | July 28, 2000      | Percocet | 100 |
| 19. | August 25, 2000    | Percocet | 60  |
| 20. | August 25, 2000    | Valium   | 90  |
| 21. | September 21, 2000 | Percocet | 60  |
| 22. | September 21, 2000 | Valium   | 90  |
| 23. | October 20, 2000   | Percocet | 60  |
| 24. | October 20, 2000   | Tuinal   | 60  |
| 25. | October 20, 2000   | Valium   | 90  |
| 26. | November 21, 2000  | Percocet | 60  |
| 27. | November 21, 2000  | Tuinal   | 60  |
| 28. | November 21, 2000  | Valium   | 90  |
| 29. | November 21, 2000  | Percocet | 60  |
| 30. | November 21, 2000  | Valium   | 90  |
| 31. | December 14, 2000  | Percocet | 60  |
| 32. | January 11, 2001   | Percocet | 60  |
| 33. | January 11, 2001   | Tuinal   | 60  |
| 34. | January 11, 2001   | Valium   | 90  |
| 35. | February 8, 2001   | Percocet | 60  |
| 36. | February 8, 2001   | Tuinal   | 60  |
| 37. | February 8, 2001   | Valium   | 90  |

|     |                    |          |    |
|-----|--------------------|----------|----|
| 38. | March 9, 2001      | Percocet | 60 |
| 39. | March 9, 2001      | Tuinal   | 60 |
| 40. | March 9, 2001      | Valium   | 90 |
| 41. | April 6, 2001      | Percocet | 60 |
| 42. | April 6, 2001      | Tuinal   | 60 |
| 43. | April 6, 2001      | Valium   | 90 |
| 44. | May 4, 2001        | Percocet | 60 |
| 45. | May 4, 2001        | Tuinal   | 60 |
| 46. | May 4, 2001        | Valium   | 90 |
| 47. | June 1, 2001       | Percocet | 60 |
| 48. | June 1, 2001       | Tuinal   | 60 |
| 49. | June 1, 2001       | Valium   | 90 |
| 50. | July 18, 2001      | Percocet | 60 |
| 51. | July 18, 2001      | Tuinal   | 60 |
| 52. | July 18, 2001      | Valium   | 90 |
| 53. | August 15, 2001    | Percocet | 60 |
| 54. | August 15, 2001    | Tuinal   | 60 |
| 55. | August 15, 2001    | Valium   | 90 |
| 56. | September 20, 2001 | Percocet | 60 |
| 57. | September 20, 2001 | Tuinal   | 60 |
| 58. | September 20, 2001 | Valium   | 90 |
| 59. | October 29, 2001   | Percocet | 60 |
| 60. | October 29, 2001   | Tuinal   | 60 |
| 61. | October 29, 2001   | Valium   | 90 |
| 62. | November 27, 2001  | Percocet | 60 |
| 63. | November 27, 2001  | Tuinal   | 60 |
| 64. | November 27, 2001  | Valium   | 90 |

|     |                   |          |    |
|-----|-------------------|----------|----|
| 65. | January 3, 2002   | Percocet | 60 |
| 66. | January 3, 2002   | Tuinal   | 60 |
| 67. | January 3, 2002   | Valium   | 90 |
| 68. | February 11, 2002 | Percocet | 60 |
| 69. | February 11, 2002 | Tuinal   | 60 |
| 70. | February 11, 2002 | Valium   | 90 |
| 71. | March 12, 2002    | Percocet | 60 |
| 72. | March 12, 2002    | Tuinal   | 60 |
| 73. | March 12, 2002    | Valium   | 90 |
| 74. | April 11, 2002    | Percocet | 60 |
| 75. | April 11, 2002    | Tuinal   | 60 |
| 76. | April 11, 2002    | Valium   | 90 |

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNTS SEVENTY-SEVEN THROUGH ONE HUNDRED TWENTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations contained in paragraphs 1 through 3 in Counts One Through Seventy-Six are incorporated here.

2. On or about each of the dates listed below, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

**JACK KARLIN**

did knowingly and intentionally dispense and distribute the controlled substances listed below, that is Percocet, which contains oxycodone, a Schedule II controlled substance; Tuinal, which contains secobarbital and amytal, Schedule II controlled substances, and Nembutal; which contains pentobarbital, a Schedule II controlled substance, to Arthur Rodia, Sr., with prescriptions in the name "A.R.J.", without a legitimate medical purpose and outside the usual course of professional practice:

| <b>COUNT</b> | <b>DATE</b>                      | <b>SUBSTANCES</b>    | <b>QUANTITY (pills)</b> |
|--------------|----------------------------------|----------------------|-------------------------|
| 77.          | January 20, 2000                 | Percocet             | 100                     |
| 78.          | February 18, 2000                | Percocet             | 100                     |
| 79.<br>80.   | March 17, 2000<br>March 17, 2000 | Percocet<br>Nembutal | 100<br>60               |
| 81.          | May 5, 2000                      | Percocet             | 100                     |
| 82.<br>83.   | June 2, 2000<br>June 2, 2000     | Percocet<br>Tuinal   | 100<br>60               |

|      |                    |          |     |
|------|--------------------|----------|-----|
| 84.  | June 30, 2000      | Percocet | 100 |
| 85.  | June 30, 2000      | Valium   | 90  |
| 86.  | July 28, 2000      | Percocet | 60  |
| 87.  | August 25, 2000    | Percocet | 100 |
| 88.  | August 25, 2000    | Tuinal   | 60  |
| 89.  | September 21, 2000 | Percocet | 100 |
| 90.  | September 21, 2000 | Tuinal   | 60  |
| 91.  | October 20, 2000   | Percocet | 100 |
| 92.  | October 20, 2000   | Tuinal   | 60  |
| 93.  | November 21, 2000  | Percocet | 100 |
| 94.  | November 21, 2000  | Tuinal   | 60  |
| 95.  | December 14, 2000  | Percocet | 100 |
| 96.  | December 14, 2000  | Tuinal   | 60  |
| 97.  | December 14, 2000  | Valium   | 90  |
| 98.  | January 11, 2001   | Percocet | 100 |
| 99.  | January 11, 2001   | Tuinal   | 60  |
| 100. | February 8, 2001   | Percocet | 100 |
| 101. | February 8, 2001   | Tuinal   | 60  |
| 102. | March 9, 2001      | Percocet | 100 |
| 103. | March 9, 2001      | Tuinal   | 60  |
| 104. | April 6, 2001      | Percocet | 100 |
| 105. | April 6, 2001      | Tuinal   | 60  |
| 106. | May 4, 2001        | Percocet | 100 |
| 107. | May 4, 2001        | Tuinal   | 60  |

|              |  |                    |           |
|--------------|--|--------------------|-----------|
| 108.<br>109. | June 1, 2001<br>June 1, 2001             | Percocet<br>Tuinal | 100<br>60 |
| 110.<br>111. | July 18, 2001<br>July 18, 2001           | Percocet<br>Tuinal | 100<br>60 |
| 112.<br>113. | August 15, 2001<br>August 15, 2001       | Percocet<br>Tuinal | 100<br>60 |
| 114.<br>115. | September 20, 2001<br>September 20, 2001 | Percocet<br>Tuinal | 100<br>60 |
| 116.<br>117. | October 29, 2001<br>October 29, 2001     | Percocet<br>Tuinal | 100<br>60 |
| 118.<br>119. | November 27, 2001<br>November 27, 2001   | Percocet<br>Tuinal | 100<br>60 |
| 120.<br>121. | January 3, 2002<br>January 3, 2002       | Percocet<br>Tuinal | 100<br>60 |
| 122.<br>123. | February 11, 2002<br>February 11, 2002   | Percocet<br>Tuinal | 100<br>60 |
| 124.<br>125. | March 12, 2002<br>March 12, 2002         | Percocet<br>Tuinal | 100<br>60 |
| 126.<br>127. | April 11, 2002<br>April 11, 2002         | Percocet<br>Tuinal | 100<br>60 |

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNTS ONE HUNDRED TWENTY-EIGHT THROUGH ONE HUNDRED  
EIGHTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations contained in paragraphs 1 through 3 in Counts One Through Seventy-Six are incorporated here.

2. On or about each of the dates listed below, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

**JACK KARLIN**

did knowingly and intentionally dispense and distribute the controlled substances listed below, that is Percocet, which contains oxycodone, a Schedule II controlled substance; and Valium, which contains diazepam, a Schedule IV controlled substance, to Arthur Rodia, Sr., with prescriptions in the name "W.R.", without a legitimate medical purpose and outside the usual course of professional practice:

| COUNT | DATE              | SUBSTANCES | QUANTITY (pills) |
|-------|-------------------|------------|------------------|
| 128.  | January 20, 2000  | Percocet   | 90               |
| 129.  | January 20, 2000  | Valium     | 60               |
| 130.  | February 18, 2000 | Percocet   | 90               |
| 131.  | February 18, 2000 | Valium     | 60               |
| 132.  | February 18, 2000 | Percocet   | 90               |
| 133.  | March 17, 2000    | Percocet   | 90               |
| 134.  | March 17, 2000    | Valium     | 60               |
| 135.  | May 5, 2000       | Percocet   | 90               |
| 136.  | May 5, 2000       | Valium     | 60               |

|              |  |                    |          |
|--------------|--|--------------------|----------|
| 137.<br>138. | June 2, 2000<br>June 2, 2000             | Percocet<br>Valium | 90<br>60 |
| 139.<br>140. | June 30, 2000<br>June 30, 2000           | Percocet<br>Valium | 90<br>60 |
| 141.<br>142. | July 28, 2000<br>July 28, 2000           | Percocet<br>Valium | 90<br>60 |
| 143.<br>144. | August 25, 2000<br>August 25, 2000       | Percocet<br>Valium | 90<br>60 |
| 145.<br>146. | September 21, 2000<br>September 21, 2000 | Percocet<br>Valium | 90<br>60 |
| 147.<br>148. | October 20, 2000<br>October 20, 2000     | Percocet<br>Valium | 90<br>60 |
| 149.<br>150. | November 21, 2000<br>November 21, 2000   | Percocet<br>Valium | 90<br>60 |
| 151.<br>152. | December 14, 2000<br>December 14, 2000   | Percocet<br>Valium | 90<br>60 |
| 153.<br>154. | January 11, 2001<br>January 11, 2001     | Percocet<br>Valium | 90<br>60 |
| 155.<br>156. | February 8, 2001<br>February 8, 2001     | Percocet<br>Valium | 90<br>60 |
| 157.<br>158. | March 9, 2001<br>March 9, 2001           | Percocet<br>Valium | 90<br>60 |

|              |  |                    |          |
|--------------|--|--------------------|----------|
| 159.<br>160. | April 6, 2001<br>April 6, 2001           | Percocet<br>Valium | 90<br>60 |
| 161.<br>162. | May 4, 2001<br>May 4, 2001               | Percocet<br>Valium | 90<br>60 |
| 163.<br>164. | June 1, 2001<br>June 1, 2001             | Percocet<br>Valium | 90<br>60 |
| 165.<br>166. | July 18, 2001<br>July 18, 2001           | Percocet<br>Valium | 90<br>60 |
| 167.<br>168. | August 15, 2001<br>August 15, 2001       | Percocet<br>Valium | 90<br>60 |
| 169.<br>170. | September 20, 2001<br>September 20, 2001 | Percocet<br>Valium | 90<br>60 |
| 171.<br>172. | October 29, 2001<br>October 29, 2001     | Percocet<br>Valium | 90<br>60 |
| 173.<br>174. | November 27, 2001<br>November 27, 2001   | Percocet<br>Valium | 90<br>60 |
| 175.<br>176. | January 3, 2002<br>January 3, 2002       | Percocet<br>Valium | 90<br>60 |
| 177.<br>178. | February 11, 2002<br>February 11, 2002   | Percocet<br>Valium | 90<br>60 |
| 179.<br>180. | March 12, 2002<br>March 12, 2002         | Percocet<br>Valium | 90<br>60 |

|      |                |          |    |
|------|----------------|----------|----|
| 181. | April 11, 2002 | Percocet | 90 |
| 182. | April 11, 2002 | Valium   | 60 |

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841 (b)(1)(C).

**COUNTS ONE-HUNDRED EIGHTY-THREE THROUGH**  
**TWO HUNDRED SIXTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations contained in paragraphs 1 through 3 in Counts One Through Seventy-Six are incorporated here.

2. On or about each of the dates listed below, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

**JACK KARLIN**

did knowingly and intentionally dispense and distribute the controlled substances listed below, that is Percocet, which contains oxycodone, a Schedule II controlled substance; Tuinal, which contains secobarbital and amytal, Schedule II controlled substances; and Valium, which contains diazepam, a Schedule IV controlled substance, to Arthur Rodia, Sr., with prescriptions in the name "J.R.", without a legitimate medical purpose and outside the usual course of professional practice:

| COUNT | DATE              | SUBSTANCES | QUANTITY (pills) |
|-------|-------------------|------------|------------------|
| 183.  | January 20, 2000  | Percocet   | 100              |
| 184.  | January 20, 2000  | Valium     | 60               |
| 185.  | February 18, 2000 | Percocet   | 100              |
| 186.  | February 18, 2000 | Nembutal   | 60               |
| 187.  | February 18, 2000 | Valium     | 60               |
| 188.  | March 17, 2000    | Percocet   | 100              |
| 189.  | March 17, 2000    | Nembutal   | 60               |
| 190.  | March 17, 2000    | Valium     | 60               |

|      |                    |          |     |
|------|--------------------|----------|-----|
| 191. | May 5, 2000        | Percocet | 100 |
| 192. | May 5, 2000        | Nembutal | 60  |
| 193. | May 5, 2000        | Valium   | 60  |
| 194. | June 2, 2000       | Percocet | 100 |
| 195. | June 2, 2000       | Valium   | 60  |
| 196. | June 30, 2000      | Percocet | 100 |
| 197. | June 30, 2000      | Valium   | 60  |
| 198. | July 28, 2000      | Percocet | 100 |
| 199. | July 28, 2000      | Tuinal   | 60  |
| 200. | July 28, 2000      | Valium   | 60  |
| 201. | August 25, 2000    | Percocet | 100 |
| 202. | August 25, 2000    | Tuinal   | 60  |
| 203. | August 25, 2000    | Valium   | 60  |
| 204. | September 21, 2000 | Percocet | 100 |
| 205. | September 21, 2000 | Tuinal   | 60  |
| 206. | September 21, 2000 | Valium   | 60  |
| 207. | October 20, 2000   | Percocet | 100 |
| 208. | October 20, 2000   | Tuinal   | 60  |
| 209. | October 20, 2000   | Valium   | 60  |
| 210. | November 21, 2000  | Percocet | 100 |
| 211. | November 21, 2000  | Tuinal   | 60  |
| 212. | November 21, 2000  | Valium   | 60  |

|      |                   |          |     |
|------|-------------------|----------|-----|
| 213. | December 14, 2000 | Percocet | 100 |
| 214. | December 14, 2000 | Tuinal   | 60  |
| 215. | December 14, 2000 | Valium   | 60  |
| 216. | January 11, 2001  | Percocet | 100 |
| 217. | January 11, 2001  | Tuinal   | 60  |
| 218. | January 11, 2001  | Valium   | 60  |
| 219. | February 8, 2001  | Percocet | 100 |
| 220. | February 8, 2001  | Tuinal   | 60  |
| 221. | February 8, 2001  | Valium   | 60  |
| 222. | March 9, 2001     | Percocet | 100 |
| 223. | March 9, 2001     | Tuinal   | 60  |
| 224. | March 9, 2001     | Valium   | 60  |
| 225. | April 6, 2001     | Percocet | 100 |
| 226. | April 6, 2001     | Tuinal   | 60  |
| 227. | April 6, 2001     | Valium   | 60  |
| 228. | May 4, 2001       | Percocet | 100 |
| 229. | May 4, 2001       | Tuinal   | 60  |
| 230. | May 4, 2001       | Valium   | 60  |
| 231. | May 4, 2001       | Valium   | 90  |
| 232. | June 1, 2001      | Percocet | 100 |
| 233. | June 1, 2001      | Tuinal   | 60  |
| 234. | June 1, 2001      | Valium   | 60  |
| 235. | July 18, 2001     | Percocet | 100 |
| 236. | July 18, 2001     | Tuinal   | 60  |
| 237. | July 18, 2001     | Valium   | 60  |
| 238. | August 15, 2001   | Percocet | 100 |
| 239. | August 15, 2001   | Tuinal   | 60  |
| 240. | August 15, 2001   | Valium   | 60  |

|      |                    |          |     |
|------|--------------------|----------|-----|
| 241. | September 20, 2001 | Percocet | 100 |
| 242. | September 20, 2001 | Tuinal   | 60  |
| 243. | September 20, 2001 | Valium   | 60  |
| 244. | October 29, 2001   | Percocet | 100 |
| 245. | October 29, 2001   | Tuinal   | 60  |
| 246. | October 29, 2001   | Valium   | 60  |
| 247. | November 27, 2001  | Percocet | 100 |
| 248. | November 27, 2001  | Tuinal   | 60  |
| 249. | November 27, 2001  | Valium   | 60  |
| 250. | January 3, 2002    | Percocet | 100 |
| 251. | January 3, 2002    | Tuinal   | 60  |
| 252. | January 3, 2002    | Valium   | 60  |
| 253. | February 11, 2002  | Percocet | 100 |
| 254. | February 11, 2002  | Tuinal   | 60  |
| 255. | February 11, 2002  | Valium   | 60  |
| 256. | March 12, 2002     | Percocet | 100 |
| 257. | March 12, 2002     | Tuinal   | 60  |
| 258. |                    | Valium   | 60  |
| 259. | April 11, 2002     | Percocet | 100 |
| 260. | April 11, 2002     | Tuinal   | 60  |
| 261. | April 11, 2002     | Valium   | 60  |

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) .

**COUNTS TWO HUNDRED SIXTY-TWO THROUGH**  
**THREE HUNDRED FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations contained in paragraphs 1 through 3 in Counts One Through Seventy-Six are incorporated here.

2. On or about each of the dates listed below, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

**JACK KARLIN**

did knowingly and intentionally dispense and distribute the controlled substances listed below, that is Percocet, which contains oxycodone, a Schedule II controlled substance; and Valium, which contains diazepam, a Schedule IV controlled substance, to Arthur Rodia, Sr., with prescriptions in the name "M.W.", without a legitimate medical purpose and outside the usual course of professional practice:

| <b>COUNT</b> | <b>DATE</b>                            | <b>SUBSTANCES</b>  | <b>QUANTITY (pills)</b> |
|--------------|--|--------------------|-------------------------|
| 262.<br>263. | January 20, 2000<br>January 20, 2000   | Percocet<br>Valium | 60<br>30                |
| 264.<br>265. | February 18, 2000<br>February 18, 2000 | Percocet<br>Valium | 60<br>30                |
| 266.<br>267. | March 17, 2000<br>March 17, 2000       | Percocet<br>Valium | 60<br>30                |
| 268.<br>269. | May 5, 2000<br>May 5, 2000             | Percocet<br>Valium | 60<br>30                |

|              |  |                    |          |
|--------------|--|--------------------|----------|
| 270.<br>271. | June 2, 2000<br>June 2, 2000             | Percocet<br>Valium | 60<br>30 |
| 272.<br>273. | June 30, 2000<br>June 30, 2000           | Percocet<br>Valium | 60<br>30 |
| 274.<br>275. | July 28, 2000<br>July 28, 2000           | Percocet<br>Valium | 60<br>30 |
| 276.<br>277. | August 25, 2000<br>August 25, 2000       | Percocet<br>Valium | 60<br>30 |
| 278.<br>279. | September 21, 2000<br>September 21, 2000 | Percocet<br>Valium | 60<br>30 |
| 280.<br>281. | October 20, 2000<br>October 20, 2000     | Percocet<br>Valium | 60<br>30 |
| 282.<br>283. | November 21, 2000<br>November 21, 2000   | Percocet<br>Valium | 60<br>30 |
| 284.<br>285. | December 14, 2000<br>December 14, 2000   | Percocet<br>Valium | 60<br>30 |
| 286.<br>287. | January 11, 2001<br>January 11, 2001     | Percocet<br>Valium | 60<br>30 |
| 288.<br>289. | February 8, 2001<br>February 8, 2001     | Percocet<br>Valium | 60<br>30 |
| 290.<br>291. | March 9, 2001<br>March 9, 2001           | Percocet<br>Valium | 60<br>30 |
| 292.<br>293. | April 6, 2001<br>April 6, 2001           | Percocet<br>Valium | 60<br>30 |

|              |  |                    |          |
|--------------|--|--------------------|----------|
| 294.<br>295. | May 4, 2001<br>May 4, 2001               | Percocet<br>Valium | 60<br>30 |
| 296.<br>297. | June 1, 2001<br>June 1, 2001             | Percocet<br>Valium | 60<br>30 |
| 298.<br>299. | July 18, 2001<br>July 18, 2001           | Percocet<br>Valium | 60<br>30 |
| 300.<br>301. | August 15, 2001<br>August 15, 2001       | Percocet<br>Valium | 60<br>30 |
| 302.<br>303. | September 20, 2001<br>September 20, 2001 | Percocet<br>Valium | 60<br>30 |
| 304.<br>305. | October 29, 2001<br>October 29, 2001     | Percocet<br>Valium | 60<br>30 |
| 306.<br>307. | November 27, 2001<br>November 27, 2001   | Percocet<br>Valium | 60<br>30 |
| 308.<br>309. | January 3, 2002<br>January 3, 2002       | Percocet<br>Valium | 60<br>30 |
| 310.<br>311. | February 11, 2002<br>February 11, 2002   | Percocet<br>Valium | 60<br>30 |
| 312.<br>313. | March 12, 2002<br>March 12, 2002         | Percocet<br>Valium | 60<br>30 |
| 314.<br>315. | April 11, 2002<br>April 11, 2002         | Percocet<br>Valium | 60<br>30 |

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNTS THREE HUNDRED SIXTEEN**  
**THROUGH THREE HUNDRED TWENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations contained in paragraphs 1 through 3 in Counts One Through Seventy-Six are incorporated here.
2. On or about each of the dates listed below, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

**JACK KARLIN**

did knowingly and intentionally dispense and distribute the controlled substances below, that is Darvon, which contains propoxyphene hydrochloride, a Schedule IV controlled substance; and Restoril, which contains temazepam, a Schedule IV controlled substance, to an undercover agent using the name "Corey Winkelman", without a legitimate medical purpose and outside the usual course of professional practice:

| COUNT        | DATE                                   | SUBSTANCES         | QUANTITY<br>(pills) |
|--------------|--|--------------------|---------------------|
| 316.         | November 27, 2001                      | Darvon             | 60                  |
| 317.         | January 3, 2002                        | Darvon             | 100                 |
| 318.<br>319. | February 11, 2002<br>February 11, 2002 | Darvon<br>Restoril | 100<br>30           |
| 320.<br>321. | March 12, 2002<br>March 12, 2002       | Darvon<br>Restoril | 100<br>30           |

|              |                                  |                    |           |
|--------------|----------------------------------|--------------------|-----------|
| 322.<br>323. | April 11, 2002<br>April 11, 2002 | Darvon<br>Restoril | 100<br>30 |
|--------------|----------------------------------|--------------------|-----------|

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(2).

**COUNT THREE HUNDRED TWENTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about June 15, 1996, a car accident involving an individual, known to the Grand Jury as M.W., occurred in Philadelphia, Pennsylvania.
2. On or about July 6, 1996, defendant **JACK KARLIN** allegedly commenced treatment of M.W. for "cervical strain and sprain with myofascitis, lumbar strain and sprain with myofascitis, internal derangement right ankle with traumatic bursitis and contusion of nose" at his office located at 2500 South Sheridan Street, Philadelphia, PA.
3. The treatment for M.W.'s medical condition allegedly consisted of hot packs, electrical stimulation of her muscles, physical therapy, and Osteopathic manipulation performed by defendant **JACK KARLIN** and his office staff. In addition, defendant **KARLIN** wrote prescriptions for Percocet, a Schedule II controlled substance, and Valium, a Schedule IV controlled substance, in M.W.'s name as part of her treatment.
4. Defendant **JACK KARLIN** never examined or treated M.W. As part of the scheme, defendant **KARLIN** falsified patient records to evidence treatment that was never performed by initialing physical therapy notes and making false entries in M.W.'s patient chart regarding the status of her condition in order to justify the prescribing of controlled substances and the billing of M.W.'s insurance company.
5. Defendant **JACK KARLIN** also submitted letters to M.W.'s attorney updating her condition. On January 14, 1998, defendant **KARLIN** stated in a signed letter to counsel for M.W. that "[M.W.]'s complaints continue with almost the same intensity and

frequency as she had immediately after the accident. Her pain and spasm are a hindrance to her daily living routine." At that time, M.W. was, in fact, living in California.

6. From on or about August 21, 1996, to until or about June 23, 1999, in the Eastern District of Pennsylvania, defendant

**JACK KARLIN**

knowingly and willfully executed a scheme to defraud a health care benefit program, that is, Ohio Casualty Insurance Company, and to obtain money and property owned by and under the custody and control of those health care benefit programs, by means of false and fraudulent pretenses, representations, and promises, in connection with the delivery of, and payment for, health care benefits, items and services, by causing the submission and payment of fraudulent health care insurance claims purportedly for medical treatments such as electrical muscle stimulation and hot packs provided to M.W., that defendant knew were never rendered, in the total approximate amount of \$6,657.00.

In violation of Title 18, United States Code, Section 1347.

**COUNT THREE HUNDRED TWENTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about September 4, 1998, a person known to the Grand Jury as A.R.J. was in a car accident and suffered multiple injuries.
2. On or about September 8, 1998, defendant **JACK KARLIN** allegedly examined and ordered treatment for A.R.J. This treatment, which allegedly commenced on September 10, 1998, consisted of hot packs, electrical muscle stimulation and recurring office visits until February 18, 2000. In addition, defendant **KARLIN** prescribed controlled substances in A.R.J.'s name to address the symptoms associated with the injuries suffered as a result of the car accident. These prescriptions were written without A.R.J. having been examined or even present in defendant's office located at 2500 South Sheridan Street, Philadelphia, PA.
3. Defendant, **JACK KARLIN** did not perform medical treatments or examinations on A.R.J. Instead, defendant **KARLIN** falsified A.R.J.'s patient chart to support billings for treatments that were never rendered.
4. From on or about September 8, 1998, to until or about February 28, 2000, in the Eastern District of Pennsylvania, defendant

**JACK KARLIN**

knowingly and willfully executed a scheme to defraud a health care benefit program, that is, Ohio Casualty Insurance Company, and to obtain money and property owned by and under the custody and control of those health care benefit programs, by means of false and fraudulent pretenses, representations, and promises, in connection with the delivery of, and payment for, health care benefits, items and services, by causing the submission and payment of fraudulent health care

insurance claims purportedly for medical treatments such as electrical muscle stimulation and hot packs provided to A.R.J., that defendant knew were never rendered, in the total approximate amount of \$3,691.96.

In violation of Title 18, United States Code, Section 1347.

**COUNT THREE HUNDRED TWENTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations contained in paragraphs 1 through 3 in Counts One Through Seventy-Six and paragraphs 1 through 5 in Count 324 are incorporated here.

2. In or about September 2001, a Federal Grand Jury commenced an investigation into allegations relating to the illegal distribution of controlled substances by defendant **JACK KARLIN**.

3. On or about July 9, 2002, a telephone call was placed by Arthur Rodia, Sr. (Rodia), to defendant **JACK KARLIN** advising defendant **KARLIN** that the DEA had been to Rodia's house and had taken pill bottles containing controlled substances with labels bearing the names of Rodia's son and niece, both of whom live out-of-state. Rodia also advised defendant **KARLIN** that Rodia had been subpoenaed to provide testimony before a Federal Grand Jury.

4. During the telephone conversation, defendant **JACK KARLIN** told Rodia that he should falsely testify to the grand jury that he (Rodia) had been sending controlled substances, prescribed by defendant **KARLIN**, through the mail to Rodia's son in Florida and his niece in California, knowing this fact to be false.

5. Defendant **JACK KARLIN** further told Rodia to testify before the federal grand jury that Rodia's son, a person known to the Grand Jury as W.R., and niece, a person known to the Grand Jury as M.W., were physically present at defendant **KARLIN's** medical office located at 2500 South Sheridan Street, Philadelphia, PA, to receive medical treatment since defendant **KARLIN** had billed insurance for these visits, knowing that the patients had, in fact, never been treated by defendant **KARLIN**.

6. On or about July 11, 2002, a telephone call was placed by Rodia to defendant **JACK KARLIN** advising defendant **KARLIN** that his son and his niece were "on board" and that they would be coming to Philadelphia to meet defendant **KARLIN**. During this conversation, defendant **KARLIN** stated that Rodia had been telling defendant **KARLIN** that Rodia's niece and son had back problems and that they were doing "all right" knowing these facts were false.

7. From on or about July 9, 2002 through July 11, 2002, in the Eastern District of Pennsylvania, defendant

**JACK KARLIN**

attempted to corruptly persuade Arthur Rodia, Sr., with the intent to influence the testimony of Arthur Rodia, Sr. in an official proceeding, that is, the federal grand jury.

In violation of Title 18, United States Code, Section 1512(b)(1).

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FOREPERSON

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PATRICK L. MEEHAN  
United States Attorney